

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION**

**UNITED STATES OF AMERICA,
PLAINTIFF**

VERSUS

**CATAHOULA PARISH SCHOOL
BOARD, ET AL,
DEFENDANTS**

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CIVIL ACTION NO. 69-cv-14430

JUDGE DRELL

**MEMORANDUM IN SUPPORT OF MOTION TO CONSOLIDATE SCHOOLS
IN HARRISONBURG AND SICILY ISLAND ATTENDANCE ZONES**

Defendant, Catahoula Parish School Board (“School Board”), respectfully submits the following memorandum of authorities in support of its motion to consolidate schools in the Harrisonburg and Sicily Island student attendance zones.

In the Harrisonburg school attendance zone, students in grades K-8 attend Harrisonburg Elementary School and students in grades 9-12 attend Harrisonburg High School. The two (2) schools are located on separate campuses and are operated as two (2) separate schools. As of October 1, 2011, Harrisonburg Elementary served 217 students (190 W, 27 B) and Harrisonburg High School served 82 students (71 W, 11 B). There is sufficient capacity in the Harrisonburg Elementary School facility to accommodate the high school students, and the School Board would like to transfer the high school students there and discontinue utilization of the Harrisonburg High School facility.

There are three (3) schools serving the students in the Sicily Island school attendance zone. Martin Junior High School serves students in grades pre-K and 5-8. As of October 1, 2011, Martin Junior High School served 102 students (40 W, 61 B, 1 O). Sicily Island Elementary School, which is located on the same campus as Sicily Island High School, serves 128 students (58 W, 67 B, 3 O)

in grades K-4. Sicily Island High School currently serves 58 students (29 W, 28 B, 1 O) in grades 9-12. The School Board proposes to discontinue utilization of the Martin Junior High School facility and to combine the students from that school with the students at Sicily Island Elementary and Sicily Island High School to create a new Sicily Island High School serving grades pre-K-12. The consolidation of those schools into a single school will not effect the racial demographics of those schools nor will it impede desegregation of them.

The School Board is currently facing a severe financial crisis. There has been no increase in state assistance for public education for the last three (3) fiscal years, and Governor Jindal has recently announced that it is unlikely that there will be any increase during the 2012-13 fiscal year. At the same time, however, health care costs, retirement costs, utility costs, and other expenses of operation continue to escalate dramatically. Despite these facts, however, the School Board is obligated by state law to operate with a balanced budget. Accordingly, significant cuts in expenditures must be made.

Please find attached hereto as Exhibit A a document prepared by School Board staff personnel detailing the projected savings for each of the consolidations outlined hereinabove. As the Court will note, the operation of a single K-12 facility in Harrisonburg is projected to save the School Board \$211,021.00 per year while the projected savings brought about by the closure of Martin Junior High School would be \$370,230.00 per year. These are savings that the School Board cannot afford to ignore.

In light of the fact that capacity exists within schools in each of the attendance zones so as to permit the requested consolidations within those zones, and, in light of the fact that such consolidations will not alter the racial demographics of the schools in question or impede the efforts

of the school system to desegregate those schools to the extent required by law, the School Board respectfully prays that it be authorized to make such consolidations beginning with the 2012-13 school year. The School Board would also show that this motion has been discussed with counsel for the United States of America, plaintiff in this matter, and that said counsel has authorized undersigned counsel to inform the Court that the United States has no objection to the Court's approval of this motion.

Respectfully submitted,

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s/ Robert L. Hammonds

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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that is a true and correct copy of the above and foregoing ***Memorandum*** was filed electronically with the Clerk of Court by use of the CM/ECF system, which will send a notice of electronic filing to counsel registered with the Court for receipt of pleadings by e-mail.

BATON ROUGE, LOUISIANA this 12th day of March, 2012.

s/ Robert L. Hammonds

ROBERT L. HAMMONDS